

June 11, 2015

Via ECF

The Honorable Lorna G. Schofield
United States District Judge for the
Southern District of New York
40 Foley Square
New York, New York 10007

Re: ***Thind v. HF Management Services, LLC, Civil Docket No. 14-9539 (LGS)***

Dear Judge Schofield:

Pursuant to the Second Amended Civil Case Management Plan and Scheduling Order dated May 7, 2015 (ECF No. 35), we respectfully submit this joint letter on behalf of all parties to explain what discovery has taken place, what discovery remains and how the parties are acting diligently to meet the discovery deadline.

The parties have been working in good faith to exchange discovery. To date, the parties have exchanged document requests and interrogatories and responses thereto. The parties have also collectively produced a substantial number of documents in response to these requests.

In addition, the parties have started deposition discovery. On June 9, 2015, Plaintiff took the deposition of Defendant's corporate representative pursuant to Federal Rule of Civil Procedure 30(b)(6). The parties have scheduled two more depositions to occur within the next two weeks.

Absent unforeseen circumstances, the parties expect to fully comply with Your Honor's current scheduling order.

By: s/ Samuel Veytsman
Samuel Veytsman
Michael J. Borrelli
Alexander T. Coleman
Borrelli & Associates, P.L.L.C.
1010 Northern Blvd., Suite 328
Great Neck, New York 11021
Tel: (516) 248-5550
Fax: (516) 248-6027
Email: sve@employmentlawyernewyork.com
mjb@employmentlawyernewyork.com
atc@employmentlawyernewyork.com

Attorneys for Plaintiff

By: s/ Scott B. Klugman
Scott B. Klugman
Seth L. Levine
Aaron I. Karp
Levine Lee LLP
666 Fifth Avenue
New York, New York 10103
Tel: (212) 223-4400
Fax: (212) 223-4425
Email: sklugman@levinelee.com
slevine@levinelee.com
akarp@levinelee.com

Attorneys for Defendant